

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 4 CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT  
JUDGE

**DEFENDANTS' NOTICE OF ADOPTION OF PRIOR DAUBERT MOTIONS AND  
REPLY BRIEFINGS OF ABBAS SHOBEIRI, M.D. FOR WAVE 4**

Come now, Defendants Ethicon, Inc., Ethicon, LLC and Johnson & Johnson (collectively, "Ethicon"), and hereby move to exclude certain general opinions of one of Plaintiffs' experts, Dr. Abbas Shobeiri. Defendants adopt and incorporate by reference the *Daubert* motion filed against Dr. Shobeiri for Ethicon Wave 1, Dkt. Nos. 2073 (motion), 2077 (memorandum in support), and supporting Reply brief, Dkt. 2219, as well as their supplemental memorandum of law filed in Ethicon Wave 3 cases, Dkt. Nos. 2764 and 2767, which addresses the Court's Wave 1 ruling with respect to Dr. Shobeiri. *See* Order, Dkt.. No. 2685.

Ethicon respectfully requests that the Court exclude Dr. Shobeiri's testimony, for the reasons expressed in the Wave 1 and 3 briefings. This notice applies to the Wave 4 cases identified in Exhibit A attached hereto.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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# EXHIBIT A

**EXHIBIT A**

<b>Case Name</b>	<b>Case Number</b>	<b>Product</b>
<i>Christine Benz v. Ethicon, Inc., et al.</i>	2:12-cv-04097	Prolift
<i>Lisa Flowers, et al. v. Ethicon, Inc., et al.</i>	2:12-cv-03922	Prolift
<i>Trisha Gaffield, et al. v. Ethicon, Inc., et al.</i>	2:12-cv-04843	Prolift, TVT-O
<i>Karen Green, et al. v. Ethicon, Inc., et al.</i>	2:12-cv-04851	TVT-O
<i>Theresa Gross v. Ethicon, Inc., et al.</i>	2:12-cv-03842	TVT, Prolift+ M
<i>Cynthia A. Howe, et al., et al. v. Ethicon, Inc., et al.</i>	2:12-cv-05237	TVT
<i>Sharon Gail Lewis, et al. v. Ethicon, Inc., et al.</i>	2:12-cv-05026	Prolift
<i>Estelle Secord, et al. v. Ethicon, Inc., et al.</i>	2:12-cv-04042	Prolift, TVT
<i>Betty Thornton, et al. v. Ethicon, Inc., et al.</i>	2:12-cv-05115	Prolift
<i>Gloria Zollman, et al. v. Ethicon, Inc., et al.</i>	2:12-cv-03951	TVT-O